

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Elahe Houshmand

GENERAL INFORMATION:

Name:	Leggett & Platt, Inc.
Address:	435 Embry Drive Leitchfield, Kentucky 42754
Date application received:	2/9/2009
SIC Code/SIC description:	3429, Hardware, NEC
Source ID:	21-085-00021
Agency Interest:	1567
Activity:	APE20090001
Permit:	F-09-008

APPLICATION TYPE/PERMIT ACTIVITY:

<input checked="" type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input checked="" type="checkbox"/> Conditional major
__Administrative	<input type="checkbox"/> Title V
__Minor	<input type="checkbox"/> Synthetic minor
__Significant	<input type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input checked="" type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input checked="" type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
__ Non-Attainment	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
__ PSD	<input type="checkbox"/> CAM	
__ Netted out of PSD/NSR		
__ Not major modification per 401 KAR 51:001, 1(116)(b)		

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy) from TEMPO	Allowable (tpy)	Potential (tpy)
PM/PM ₁₀	1.72	NA	34.3
SO ₂	0.009	NA	0.026
NO _x	1.50	NA	3.75
CO	1.26	NA	3.21
VOC	11.4	<90	138
Cr	0.0174	NA	0.139
Co	0.00032	NA	0.003
Mn	0.0111	NA	0.091
Ni	0.0402	NA	0.329
Single HAP (by CAS) Diethylene glycol monobutyl ether	1.19	7.43	7.43
Source wide HAPs		9.00	9.00

SOURCE DESCRIPTION:

The Leggett & Platt's Leitchfield facility manufactures bedframes. Raw steel is processed (cut, stamped, pressed, etc.) and welded (EP 06) into bedframes. The bedframes are hung on a monorail conveyor that travels through one of two coating processes. First, the frames enter a two-stage washer (EP05 or EP09) for removal of oils and dirt. After a few minutes of drip dry, they enter either a flow coater (EP#01) or a dip tank (EP08). Frames are coated with water based bake enamel, then frames are allowed to "flash off" for about 15 minutes at room temperature. Next, frames coated using flow coater process line 1 travel to a natural gas bake oven (EP 02) for curing and frames coated using dip tank process line 2 air dried. From the oven, frames are cooled by fans then moved to the final assembly area. A natural gas controlled pyrolysis furnace- burn-off oven (EP07) is used to clean hooks and racks that have been coated with paint.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

40 CFR 60, Subpart EE, VOC emissions will be controlled within the constraints of regulation of 40 CFR 60, Subpart EE by controlling the formulation of paint used so that VOC content is less than 0.90 Kg per Liter of coating solids applied. The owner or operator shall submit a written report every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids is greater than 0.9 kilogram per liter of coating solids applied. If no such instances have occurred during a particular quarter, a report stating this shall be submitted semiannually.

Conditional Major Emission Limitation

Leggett & Platt, Inc. located in Leitchfield, KY has requested voluntary permit limits of less than 90.0 tons per year of volatile organic compounds (VOC), 7.43 tons per year of individual hazardous air pollutant (HAP) and 9.0 tons per year of combined HAPs.

401 KAR 59:010, New process operations, Section 3

1. Visible emissions shall not equal or exceed 20% opacity for each applicable process.
2. Particulate matter emissions shall not exceed 2.34 pounds/hour for each applicable process.